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November 28, 2005

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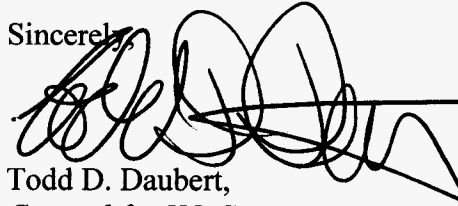
Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: WC Dockets Nos. 05-196 and 04-36
Compliance Letter

Dear Ms. Dortch:

XO Communications Services, Inc. ("XO"), by its attorneys, hereby respectfully files the attached "Compliance Letter" in accordance with the requirements set forth in the Federal Communication Commission's Public Notice, *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36 and 05-196, DA 05-2945 (rel. November 7, 2005). Please feel free to contact the undersigned if you have any questions or need additional information.

Sincerely,



Todd D. Daubert,
Counsel for XO Communications
Services, Inc.

Attachment

XO Communications Services, Inc.
Interconnected VoIP 911 Compliance Letter
WC Dockets 04-36 and 05-196

XO Communications Services, Inc. ("XO") submits the following 911 Compliance Letter ("Compliance Letter"), which contains all of the information described in the Federal Communications Commission's ("Commission" or "FCC") Public Notice, *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36 and 05-196, DA 05-2945 (rel. November 7, 2005) ("Public Notice").

XO's 911 Solution

XO provides 911 service, in compliance with the rules established in the Commission's *VoIP 911 Order*¹ to 100% of its customers.

911 Routing Information/Connectivity to Wireline E911 Network

XO transmits "all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized."² XO's IP softswitch infrastructure is directly connected, via Signaling System 7 facilities, to our Class 5 wire line switches, which are directly trunked to the appropriate Selective Routers for the areas served. As of November 28, 2005, XO is directly interconnected with 124 Selective Routers.

Transmission of ANI and Registered Location Information

XO transmits, via the Wireline E911 Network, the 911 caller's registered location and automatic numbering information ("ANI") to all answering points that are capable of receiving and processing the information. As of November 28, 2005, 72% of the answering points within XO's service area are capable of receiving and processing ANI and registered location information. Of XO's customers, 100% have their registered location information and ANI transmitted to answering points capable of processing that information.

911 Coverage

XO has achieved full 911 compliance with the requirements of the *VoIP 911 Order* in all of its service areas by November 28, 2005.

¹ *In re: IP-Enabled Services; E911 Requirements for IP-Enabled Service Providers*, 20 FCC Rcd 10245 (2005) ("VoIP 911 Order").

² *Public Notice, Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36 and 05-196, DA 05-2945 at 3 (rel. Nov. 7, 2005) ("Public Notice").

Obtaining Initial Registered Location Information

XO has obtained the registered location information for all of its customers, in compliance with the *Commission's VoIP 911 Order*. On July 29, 2005, XO mailed an E911 Advisory to each of its existing Fixed VoIP and IP PBX customers. In this advisory, XO informed its customers that, among other things, each customer must verify that it has provided XO with a correct service address (*i.e.*, registered location information), and that customers must notify XO before attempting to move their equipment to a location other than the service address provided when service was originally initiated. The advisory further explained that, if the service address that the customer provided XO contained an error, calls made to 911 emergency services could be routed to emergency personnel who would not be able to assist the caller. In order to facilitate collection of its customers' registered service locations, XO provided a toll free number by which customers could provide their correct service location to XO. With respect to new customers, XO required each customer to verify its service address with XO before services were initiated. To date, XO has obtained the registered location of 100% of its customers.

Obtaining Updated Registered Location Information

At this time, XO offers interconnected VoIP services only on a fixed basis. As such, customers must contact XO whenever they wish to establish a new service address, at which time XO would gather registered location information from the customer using the same procedures that apply to new customers. Moreover, in order to facilitate collection and verification of its customers' registered service locations, XO has established a toll free number that customers can call using the same equipment they use to access their interconnected VoIP service.

Technical Solution for Nomadic Subscribers

At this time, XO does not offer nomadic interconnected VoIP services. However, XO has sold IP PBXs to some of its customers. Like many IP PBXs sold by other vendors or service providers, the IP PBXs XO has sold have a feature that, when enabled, permits users to connect to the IP PBX from a remote location by use of a soft phone. Based upon information and belief, this feature has been activated on approximately 10 of the IP PBXs XO has sold. XO is not activating this feature for any additional IP PBXs at this time.